

# **Privacy Policy**

Sutherland District Trade Union Club Ltd ABN 17 000 341 186 (**Club**, **we** or **us**) is a registered club under the *Registered Clubs Act 1976* (NSW).

This policy applies to personal information collected from and about members and guests, other customers, staff, suppliers and any other person whose personal information the Club may collect from time to time. It does not apply to the Club's treatment of employee records, which are directly related to a current or former employment relationship between the Club and an employee.

## About this policy

The Club is bound by the Australian Privacy Principles (**Principles**) established under the *Privacy Act 1988 (Cth)* (**Act**). This policy has been developed as part of the Club's efforts to comply with its obligations under that legislation.

This policy sets out how we collect, hold, use, disclose and otherwise manage personal information (as defined in the Act) about you. We encourage you to check our website regularly for any updates to this policy. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

#### Information collected

## Types of Information Collected

We may collect personal information about you, for example, information that can identify you such as your name, address, occupation, date of birth/proof of age, photograph, other contact details and the extent of your use of (and preferences in relation to) products and services offered by, or available at or from the Club, and other information relevant to providing you with the services you are seeking.

We may request you to provide formal identification/proof of age in order to meet legal requirements for access to the Club's facilities or to provide services to you. Your identification may be scanned in our electronic kiosks, or alternatively you may sign in (if required) after your identification has been sighted by Club staff. Scanned identification is held securely in our records.

## **Purpose of Collection**

We will collect, hold and use your personal information as reasonably necessary for our activities, which would include for one or more of the following reasons:

- To identify you and process an application you have made for membership or renewal of membership, or to admit you to the Club's premises.
- To establish and maintain your membership of the Club, including providing you with newsletters, magazine and annual reports.
- To contact you about events, promotions, competitions, activities and offers provided or procured by the Club (including by direct mail, telephone, email, SMS and MMS), and to register you for such events, promotions, competitions, activities and offers.
- To provide products and services to you, and to administer any benefits to which you may become entitled.

- To provide you with information about other products and services that may be of interest to you.
- To provide you with promotional information about us.
- To facilitate our internal business operations, including without limitation the fulfilment of any legal enquiries, addressing security concerns and training our employees and contractors.
- To analyse usage of products and services offered by the Club and customer needs.
- To develop new and/or improved products and services.
- To comply with statutory requirements under legislation relating to registered clubs, liquor, gaming, anti-money laundering, counter-terrorism and other legislation which may apply to the Club.
- To analyse website usage.

## Job applicants, staff, contractors, suppliers and volunteers

We also collect personal information about job applicants, Club staff, volunteers who work with us, and details of other people who come into contact with the Club such as contractors and suppliers for the primary purpose of assessing and engaging or employing the person. The Club also holds and uses such personal information for managing the employment or engagement to meet its legal obligations.

### **Methods of Collection**

Personal information will generally be collected directly from you through the use of any of our standard forms, competition entry forms, email, comments/contributions to our social media sites, visitor sign-in terminals or when you deal with us in writing, by telephone or in person.

Information about members' purchase of products or use of services or facilities will generally be collected via use of a membership card at our visitor sign-in terminals or any of our point of sale terminals or other electronic terminals.

## Information received from other parties

Sometimes, a third party may provide us with your personal information, with or without your direct involvement. For example, we might collect personal information from:

- another organisation of which you are a member, such as a local sporting club using our facilities, or community organisation;
- a related body corporate of the Club;
- a regulatory authority, a local liquor accord or another club industry organisation;
- another member of the Club, such as through our sub-clubs;
- a contractor that provides goods or services to the Club;
- your representative(s).



## Failure to provide information

If the personal information you provide to us is incomplete or inaccurate we may be unable to provide you with the products or services you are seeking, or admit you as a member or otherwise into the Club's premises.

#### Use and disclosure

We only use and disclose personal information about you for the purpose for which it was collected, or for a related purpose as permitted by the Privacy Act, or for uses for which you have given consent (which may be express or implied). We may disclose personal information about you:

- To service providers who assist us in operating our business, perform functions on our behalf or provide services to us.
- To other sporting associations or clubs with which we have an alliance relationship.
- To other organisations in which the Club has an ownership interest.
- To an actual or prospective purchaser of the assets and operation of our business or an actual or prospective amalgamation partner (if we engage in an amalgamation process with another registered club).
- To market research agencies for conducting research.
- To anyone to whom we are required or authorised by law to do so.
- To relevant authorities when the Club suspects that unlawful or undesirable activity is being or has been conducted.
- To anyone authorised by you to receive your personal information (your consent may be express or implied, and can be withdrawn at any time).

Other than the above, we may disclose your personal information (including sensitive information as defined in the Act) to third parties on the basis that they agree with us to keep your information confidential (except where we are authorised or required by law to disclose the information). The Club will otherwise only disclose personal information to a third party where the Club has a belief that its use and/or disclosure is necessary:

- To lessen or prevent threats to an individual's life, health or safety
- To investigate any suspected unlawful or undesirable activity or serious misconduct which
  is being or has been conducted.
- To assist enforcement bodies with their activities.
- To assist in locating a missing person.
- To establish, exercise or defend a legal or equitable claim.
- For the purpose of confidential alternative dispute resolution.

You consent to us disclosing your personal information to the third parties listed above, and similar organisations who may in turn provide your information to other third parties. You can withdraw your consent at any time by informing us in writing (except where we are authorised or required by law to disclose the information).



#### Club's website

If you access our website we may collect additional personal information about you including your Internet Protocol (IP) address, domain name, type of operating system, type of browser and your general area of location. Also, our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view, so that we may serve you more effectively.

#### Links to other websites

Our website may contain links to other sites. We are not responsible for the privacy practices of linked sites and linked websites are not subject to our privacy policy and procedures.

#### Surveillance

Some parts of our premises are under video surveillance (and sometimes other surveillance).

#### Overseas transmission

The Club does not transmit personal information overseas. As far as the Club is aware none of its contractors transmit or store data overseas.

## Information security

The Club has security systems in place which are intended to protect your personal information from misuse, loss, unauthorised access, modification or disclosure by the use of various methods including locked storage of confidential paper records and password access to computerised records (depending on the nature of the information that we are holding).

We are required by law to keep some types of information for certain periods of time. If we no longer require your personal information, we will generally destroy or de-identify it. We reserve the right to retain information for longer than the minimum period required under any applicable law if we consider that it is appropriate, but we will hold it in accordance with this policy.

If the Club receives personal information about you which it did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.

## **Access and Correction**

If you wish to access the personal information we hold about you, please make a written request to our Privacy Officer. We will provide you with access to the information requested within a reasonable period after the request is made, not exceeding 30 days. We may charge you a reasonable fee for processing your request. We may decline a request for access to your personal information if the Privacy Act prohibits it or does not require us to provide access.

If you inform us that any of your personal information held by us is incorrect then we will check the information and make any appropriate correction in our records.

## **Complaints**

If you wish to make a privacy complaint, please put your complaint in writing with as much detail as possible and send it to us by letter or email using the details listed below.

The Privacy Officer or another representative of the Club, will consider (and may investigate) the complaint and provide you with a written response within a reasonable timeframe (taking into consideration the nature of your complaint).



If you are not happy with the response received from the Club, you can contact the Office of the Australian Information Commissioner <a href="https://www.oaic.gov.au">www.oaic.gov.au</a>

# **Feedback**

If you have any questions about this policy or how your personal information is held or used, please contact:

Privacy Officer Tradies

Address: 57 Manchester Road

Gymea, NSW 2227

Phone: 02 9540 1933

